

CHRISTOPHER R. MILTENBERGER, ESQ.
Nevada Bar No. 10153
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
E-mail: miltenbergerc@gtlaw.com
*Counsel for Baluma S.A. dba
Enjoy Punta del Este Resort & Casino*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BALUMA S.A. doing business as ENJOY
PUNTA DEL ESTE & CASINO,

Plaintiff,

vs.

BRIAN POFF II,

Defendant.

Case No.: 2:20-cv-01642-JCM-DJA

**STIPULATION AND ~~{Proposed}~~
ORDER EXTENDING DEADLINE TO
SUBMIT JOINT PRETRIAL ORDER**

[First Request]

Pursuant to Local Rule IA 6-1(a), IA 6-2, and 7-2, Plaintiff Baluma S.A., doing business as Enjoy Punta Del Este Resort & Casino (“Baluma”) and Defendant/Counterclaimant Brian Poff, II (“Poff”), by and through their respective undersigned counsel of record, hereby stipulate, agree and request that the Court enter an order extending the deadline for the parties to submit a Joint Pretrial Order as contemplated LR 26-1(b)(5) and the Court’s Scheduling Order (ECF 12) by 40 days for the reasons set forth herein. This is the parties’ first request for an extension of time to submit their Joint Pretrial Order.

1. On March 9, 2022, this Court entered an Order (ECF 27) granting in part and denying in part Baluma’s Motion for Summary Judgment (ECF 14).

2. As a result of the Order on Baluma’s Motion for Summary Judgment and pursuant to the Court’s Scheduling Order (ECF 12), the parties’ deadline to file a Joint Pretrial Order as contemplated by LR 26-1(b)(5) is currently April 8, 2022.

3. On April 6, 2022, counsel for Poff made his initial appearance in this action filing a Notice of Appearance (ECF 28).

4. The parties' counsel are currently engaged in settlement discussions that would resolve this case in its entirety if successful.

5. In light of Poff's counsel recent appearance in the case and the parties' ongoing settlement discussions, the parties believe that good cause exists for an extension of time and therefore respectfully request a 40-day¹ extension of time to submit a Joint Pretrial Order, extending such deadline until May 18, 2022.

IT IS SO STIPULATED.

Dated this 7th day of April 2022

Dated this 7th day of April 2022

GREENBERG TRAUIG, LLP

CARBAJAL LAW

/s/ Christopher R. Miltenberger

/s/ Hector J. Carbajal II

CHRISTOPHER R. MILTENBERGER

HECTOR J. CARBAJAL II

Nevada Bar No. 10153

Nevada Bar No. 6247

GREENBERG TRAUIG, LLP

10001 Park Run Drive

10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89145

Las Vegas, Nevada 89135

Attorney for Defendant

Attorneys for Plaintiff

Good cause appearing,

IT IS SO ORDERED.



Daniel J. Albregts

United States Magistrate Judge

DATED: April 8, 2022

¹ The parties would have requested a 30 day extension through May 8, 2022, but Mr. Carbajal will be out of the country through May 12, 2022. Thus, the parties have requested an additional ten (10) days to accommodate Mr. Carbajal's being out of the country.